

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

MEDSENSE, LLC.

Plaintiff,

v.

UNIVERSITY SYSTEM OF MARYLAND,

*et al.*

Defendants

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Case No: 8:18-CV-03262-GLS

**PLAINTIFF’S MOTION FOR LEAVE TO AMEND AND MOTION TO ALTER OR  
AMEND JUDGMENT**

Pursuant to FRCP Rule 15 and Local Rule 103(6), Plaintiff MedSense, LLC, by and through undersigned counsel, hereby requests leave to amend its First Amended Complaint and Jury Demand (ECF No. 25) and file Plaintiff’s proposed Second Amended Complaint and Jury Demand (“Second Amended Complaint”). A clean copy and a redlined copy of the proposed Second Amended Complaint are attached hereto as Exhibits 1 and 2, respectively, along with a Memorandum of Law supporting this motion. In addition, pursuant to FRCP Rule 59(e), Plaintiff requests that the Court’s Order (ECF Nos. 36 and 37) dismissing, without prejudice, Plaintiff’s claims as to all defendants be VACATED as to Defendants Miao Yu and Hyungdae Bae. For the reasons stated in the attached Memorandum of Law, this motion should be GRANTED, the foregoing Order should be VACATED, Plaintiff should be granted leave to amend accordingly, and the Second Amended Complaint should be docketed as a pleading in this action.

Pursuant to Local Rule 103(6)(d), undersigned counsel requested consent to this motion from Defendants’ counsel Catherine Bledsoe, Esq., but did not obtain such consent.

Respectfully submitted,

KELLY DORSEY, P.C.

Dated: October 25, 2019

By: /s/ Gregory A. Dorsey  
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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was filed electronically this October 25, 2019, and was served on all counsel of record by operation of the Court's electronic filing system.

KELLY DORSEY, P.C.

Dated: October 25, 2019

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